



State Engineer's Office

HERSCHLER BUILDING, 1 EAST
CHEYENNE, WYOMING 82002
(307) 777-6150

MARK GORDON
GOVERNOR

STATE ENGINEER

June 18, 2019

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

Re: Comment on WT Docket No. 19-116; In the Matter of Allocation and Service Rules for the 1675-1680 MHz Band Dear Secretary Dortch,

I am writing to you to express my deep concern about the proposed allocation of the above-referenced radio bandwidth for non-federal, flexible wireless use. The Wyoming State Engineer's Office (SEO) depends on the Geostationary Orbiting Environmental Satellites (GOES) Data Collection System (DCS) to support critical statute-driven activities. The Department is concerned that powerful transmissions in bands close to or adjacent to the relatively weak satellite download bands may significantly compromise the ability of the GOES system to download information in a near real-time manner.

The SEO uses the GOES satellite system to transmit information from over 200 stream, surface and ground water diversions and reservoir gages. We utilize real-time information from these gages, as well as several dozen gages operated by other organizations (including the U.S. Geological Survey and the Bureau of Reclamation) to make critical hour-by-hour water administration decisions. Our ability to accurately track available water in the state allows the Department to properly allocate water to the users with the highest priority, resulting in a strong economic impact on farmers, businesses and environmental interests across the state. In addition, our streamflow measurements are heavily relied upon by the National Weather Service – River Forecast Centers, and the Wyoming Office of Homeland Security to forecast and mitigate loss of life and property during flooding events. It is critical that these agencies have access to up-to-the-minute river stage and discharge values.

In summary, the SEO is strongly opposed to the allocation of the 1675-1680 MHz band for terrestrial mobile use. Any potential interference with operation of the GOES system threatens the economic security and public safety of Wyoming's citizens.

Sincerely,

Rick Deuell, P.E.
Interim State Engineer